

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

WISCONSIN ALUMNI RESEARCH
FOUNDATION,

Plaintiff

v.

APPLE INC.,

Defendant.

Case No. 3:14-cv-00062-WMC

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
WARF’S MOTION TO COMPEL APPLE TO PRODUCE
CERTAIN UNITS OF THE ACCUSED PRODUCTS**

Defendant Apple Inc. (“Apple”) respectfully moves this Court for a three business day extension of its deadline to respond to Plaintiff Wisconsin Alumni Research Foundation’s (“WARF”) Motion to Compel Apple to Produce Certain Units of the Accused Products (“Motion”).

WARF filed its Motion at 10:00 pm CST on Friday night, February 20, 2015. *See* Dkt. No. 79. Although the parties had exchanged letters regarding the substance of WARF’s motion over the weeks and days preceding WARF’s filing, WARF did not declare an impasse on the issues, nor did it provide any notice to Apple that it would be filing the Motion.

WARF’s Motion is 25 pages long, and is accompanied by a 16-page expert declaration. *See* Dkt. Nos. 79, 81. Both WARF’s motion papers as well as its expert declaration contain numerous factual assertions in addition to legal arguments. Apple would like ample opportunity to fully respond to those assertions and arguments so the Court may rule on a complete record.

Apple's current deadline to respond to WARF's Motion is February 27, 2015. The telephonic hearing on the Motion has been set for March 11, 2015. *See* Dkt. Entry dated February 25, 2015. Apple respectfully requests a three business day extension of its time to respond to WARF's motion to March 4, 2015, so that it may have adequate time to fully respond to WARF's Motion and its supporting expert declaration..

No other deadlines would be affected by the requested extension.

WARF, through its counsel, has stated that it does not oppose Apple's request for a three business day extension.

Dated: February 26, 2015

Respectfully submitted,

/s/ Bryan S. Conley

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